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VIA ECF

The Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Felipe Rodriguez v. City of New York, et. al., 21 Civ. 1649 (AMD)(RLM)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants City of New York, Sgt. George Zaroogian (Ret.) Det. John Beisel (Ret.), Det. John Califano (Ret.), Det. Jerry Fennel (Ret.) and John Wilde (Ret.) in the above referenced matter. We write to respectfully request an additional two pages (five pages total) in our upcoming letter requesting a pre-motion conference in connection with our anticipated motion to dismiss plaintiff's complaint, instead of the three allowed in Your Honor's Individual Rules of Practice. Plaintiff's complaint is 96 pages long, and contains 502 paragraphs and ten causes of action. As such, to meaningfully address the arguments that we intend to make in support of dismissal, we feel that five pages is the minimum necessary. Plaintiff consents to this request.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman
Mark D. Zuckerman
Senior Counsel

cc: All Counsel (via ECF)

